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June 21, 2023

BY: ECF

Hon. Jennifer E. Willis
United States Magistrate Judge
40 Foley Square, Room 228
United States Courthouse
New York, NY 10007

**Re: El Nabi v. City of New York
21-cv-03768 (LAK) (JW)**

Dear Hon. Willis,

We represent Plaintiff Abdelrahman Hassab El Nabi in the above referenced matter. We write to request a two-week extension of time to file our opposition to previous counsel's motion from June 26, 2023 to July 10, 2023. We also seek leave from the court to file our opposition under seal along with exhibits, attorney declarations and Plaintiff's declaration to maintain attorney-client privilege. Prior counsel consents to both of these requests. Lastly, we respectfully request an additional five pages for our opposition motion. While we can answer the court's questions within the ten-page limit, there are additional arguments we would like to present to the court that require additional pages. Prior counsel does not consent to this request.

As always, we thank the court for its time and attention to this matter.

Respectfully Submitted,

/s/
Tahanie A. Aboushi, Esq.

/s/

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